

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

TIMOTHY RYAN

]
]
]
]
]

Cr. No. 22-mj-261-AJ

ASSENTED-TO MOTION TO AMEND BAIL CONDITIONS

Timothy Ryan respectfully moves the Court to amend his release conditions. Timothy's current release conditions, set by the Court on March 17, 2023, and amended on March 24, 2023, require that he live at the Bedford VA's "Dom" program. ECF Doc. 14, ¶ Z. The program was intended to run for three months. Timothy recently completed the "Dom" program and has entered a longer-term supported housing program through the VA ("Building Five"). He will continue to receive VA-provided services at this facility, including mental health and substance misuse treatment and compensated work therapy.

The Government, through AUSA K. Weiland has no objection to this request. United States Probation, through USPO J. Peters, similarly has no objection.

WHEREFORE, Timothy Ryan respectfully moves the Court respectfully moves the Court to amend his release conditions to authorize him to reside at the VA's "Building Five" program in Bedford, Massachusetts. The Defense does not seek amendment of any other conditions.

Respectfully submitted,

Dated: June 26, 2023

/s/ Eric Wolpin

Eric Wolpin

N.H. Bar #18372

Assistant Federal Public Defender

Eric_Wolpin @fd.org